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MEMORANDUM

To: Wake County District Attorney Lorrin Freeman, Board of Elections & Ethics Enforcement Executive Director Kim Strach, Campaign for Accountability Executive Director Daniel Stevens, and other Interested Parties
From: Bob Hall
Date: January 16, 2019
Re: Campaign Contributions & Investigation of House Speaker Tim Moore

Ronald M. Cameron of Little Rock, Arkansas, is the owner and chairman of Mountaire Corp., the nation's seventh largest poultry company. The pattern of his political contributions provide additional context and raise new questions about Speaker Tim Moore's actions related to the poultry plant property that Moore's partnership sold to Mountaire.

Cameron has been a prolific donor to Republican candidates and causes for many years. His company has had operations in North Carolina since it purchased the Piedmont Poultry processing plant in Lumber Bridge in 1996, but Cameron only started making substantial political donations in the state in 2014. From July 1, 2014 to December 31, 2018, he contributed nearly \$1 million to influence elections in North Carolina.

Cameron contributed \$500 to NC Labor Commissioner Cherie Berry in April 2003 and \$4,000 to Pat McCrory's successful gubernatorial campaign in October 2012. Those are his first donations recorded in the database of the State Board of Elections that extends back to 1989. Then in July and August 2014, Cameron made 11 donations of \$2,000 to \$5,000 to 11 Republican state legislative candidates in swing district contests, including then non-incumbents Mike Clampitt, Larry Yarborough, and Michael Lee, as well as two incumbents who lost in November 2014, Rep. Mike Stone and Rep. Tom Murry.

Then in 2016, Cameron's political donations in North Carolina escalated with at least 30 donations to Republican legislative leaders, Republican legislative incumbents in swing districts, Republican Council of State incumbents, Speaker Tim Moore's House Caucus (\$25,000), and the NC Republican Party (\$125,000). He is also listed as donating \$500,000 to the Koch-related Freedom Partners Action Fund, a Super PAC that disclosed using Cameron's donation to finance a \$506,000 attack ad campaign against Roy Cooper, the Democrat challenging incumbent Gov. Pat McCrory in 2016.

In 2018, Cameron made at least 40 donations totaling \$174,000 to NC Republican legislative leaders, Republican legislative candidates, the Republican House and Senate caucuses, and Republican Supreme Court Justice Barbara Jackson. (Some campaign disclosure reports are still being processed by the State Board of Elections, so Cameron's total may increase).

According to news reports:

(1) House Speaker Tim Moore is one of the partners of Southeast Land Holdings LLC, which bought a shuttered Townsend/Omtron poultry plant in Siler City for \$85,000 in November 2013. It reached a deal to sell the property to Mountaire Farms in May 2016 after removing two

underground storage tanks with gasoline and diesel fuel; the sale was finalized for \$550,000 in September 2016. Curiously, in July 2013, Mountaire announced it was buying the Townsend/Omtron's hatchery in Siler City shortly before Omtron's remaining assets were sold at auction; it's not clear how or why Southland Land Holdings LLC, which only began in August 2013, became owner of the poultry plant property and then decided to sell. See, for example, <https://www.newsobserver.com/news/politics-government/article223925075.html> and <https://www.wattagnet.com/articles/16498-mountaire-farms-to-acquire-former-townsend-omtron-hatchery>.

(2) At the request of Speaker Moore and later intervention by one of his legislative staff members, Southeast Land Holdings received a number of extensions, penalty fine waivers, approval of a \$22,414 state subsidy, and unusual waivers from the NC Department of Environmental Quality (DEQ), all related to cleaning up the underground storage tanks on the Siler City property. See <https://campaignforaccountability.org/watchdog-again-calls-for-investigation-of-house-speaker-tim-moore-for-seeking-preferential-treatment-from-state-agency>

(3) After Mountaire agreed to buy the property, it received "fast" track approval for a beneficial Brownfields Program designation because "legislative inquiries" were made to DEQ, despite concerns by a DEQ hydrogeologist about the lack of proper tests to evaluate pollution threats remaining after the underground tanks had been removed. See email from Clark Wipfield at: <https://drive.google.com/file/d/0B8ZHU20vWyHbcWNVdVItQVdwSWZuU2UzNVg1dmZYRmlwYmJF/view>

These facts and the pattern of Ronald Cameron political donations in North Carolina raise serious questions:

- Did Cameron's substantial political donations influence the "legislative inquiries" which resulted in the fast track acceptance of Mountaire's property into the Brownfields Program? Who made those inquiries and was that action ethical or possibly an illegal *quid pro quo*? It's worth noting that the date of Mountaire's purchase of Southeast Land Holdings' property is September 22, 2016. A few weeks later, on October 21, 2016, Speaker Moore's House Republican caucus account at the NC Republican Party received a donation of \$25,000 from Ronald Cameron.
- Who advised Cameron about which legislative candidates to support in 2014 and thereafter? It's not unusual for an out-of-state donor to contribute to top legislative leaders; but that's not what Cameron did in 2014. He donated to the most vulnerable Republican legislators and to Republican candidates in swing legislative districts. It's not reasonable to believe Cameron could target these legislative candidates for his 2014 donations without assistance. When and how did his relationship with Rep. Tim Moore and Sen. Phil Berger and other NC politicians develop?
- Did Mountaire's \$550,000 payment for the property that Speaker Tim Moore's partnership bought three years earlier for \$85,000 include a bonus or possible illegal gift that directly or indirectly benefitted Speaker Moore?
- Was the intervention by Speaker Moore and his staffer Mitch Gillespie in DEQ decisions designed not only to benefit Southeast Land Holdings LLC but also to benefit Speaker Moore's relationship with Ron Cameron who was becoming a major political donor for NC Republicans? Was a person's public office illegally used to influence governmental actions for personal gain?

Below is a list of Cameron's contributions as reported by the recipients to the State Board of Elections and available through its searchable database at: <https://cf.ncsbe.gov/CFTxnLkup/>.

DONOR	DONOR CITY	COMMITTEE/CANDIDATE	CANDIDATE CITY	DATE	AMOUNT \$
Ronald Cameron	N Little Rock	BERRY FOR COMMN OF LABOR	RALEIGH	4/14/2003	500.00
Ronald Cameron	Little Rock	PAT MCCRORY COMM	CHARLOTTE	10/3/2012	4,000.00
RONALD M. CAMERON	LITTLE ROCK	CITIZENS FOR SUSAN MARTIN	WILSON	7/15/2014	2,500.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT MIKE STONE	SANFORD	7/15/2014	2,500.00
RONALD M CAMERON	LITTLE ROCK	MIKE 4 HOUSE (J M CLAMPITT)	BRYSON CITY	7/15/2014	2,500.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT BILL COOK	CHOCOWINITY	7/15/2014	2,500.00
RONALD CAMERON	LITTLE ROCK	BRIAN BROWN FOR HOUSE	GREENVILLE	7/15/2014	2,500.00
RONALD CAMERON	LITTLE ROCK	LEVINSON COMM	CHARLOTTE	7/15/2014	5,000.00
RONALD M CAMERON	LITTLE ROCK	JONATHAN JORDAN COMM	JEFFERSON	7/18/2014	2,000.00
RONALD CAMERON	LITTLE ROCK	LARRY YARBOROUGH COMM	ROXBORO	7/21/2014	2,000.00
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT MICHAEL LEE	WILMINGTON	7/23/2014	2,500.00
RONALD M CAMERON	LITTLE ROCK	WESLEY MEREDITH FOR SENATE	FAYETTEVILLE	7/25/2014	2,500.00
RONALD CAMERON	LITTLE ROCK	THOMAS O MURRY COMM	MORRISVILLE	8/7/2014	5,000.00
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT CHAD BAREFOOT	WAKE FOREST	8/18/2014	5,000.00
Ronald Cameron	Little Rock	PAT MCCRORY COMM	CHARLOTTE	12/30/2014	5,000.00
Nina Cameron	Little Rock	PAT MCCRORY COMM	CHARLOTTE	6/23/2015	5,100.00
Ronald Cameron	Little Rock	NC REPUBLICAN PARTY	RALEIGH	11/12/2015	10,000.00
RONALD M CAMERON	LITTLE ROCK	JOHN SZOKA FOR NC HOUSE	FAYETTEVILLE	1/18/2016	1,250.00
RONALD M CAMERON	LITTLE ROCK	MCINNIS FOR STATE SENATE	ROCKINGHAM	1/18/2016	1,250.00
RONALD M CAMERON	LITTLE ROCK	FOLWELL COMM	WINSTON SALEM	1/18/2016	2,500.00
RONALD M CAMERON	LITTLE ROCK	STEVE TROXLER AG COMMN	GREENSBORO	1/18/2016	5,000.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT BILL COOK	CHOCOWINITY	1/18/2016	5,000.00
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT MICHELE PRESNELL	BURNSVILLE	1/18/2016	2,500.00
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT CHAD BAREFOOT	WAKE FOREST	1/18/2016	5,000.00
RONALD M CAMERON	LITTLE ROCK	CITIZENS FOR SUSAN MARTIN	WILSON	1/22/2016	2,500.00
RONALD M CAMERON	LITTLE ROCK	JONATHAN JORDAN COMM	JEFFERSON	1/25/2016	2,500.00
RONALD CAMERON	LITTLE ROCK	JUSTIN BURR FOR NC HOUSE	Albemarle	1/25/2016	5,000.00
RONALD M CAMERON	LITTLE ROCK	CAMPAIGN TO ELECT MIKE HAGER	RUTHERFORDTON	1/28/2016	1,250.00
RONALD M CAMERON	LITTLE ROCK	PHILIP E BERGER COMM	EDEN	1/29/2016	1,250.00
RONALD CAMERON	LITTLE ROCK	NC POULTRY FED INC PAC	RALEIGH	1/31/2016	5,000.00
RONALD CAMERON	LITTLE ROCK	MILLIS FOR NC HOUSE	HAMPSTEAD	2/3/2016	2,500.00
RONALD M CAMERON	LITTLE ROCK	BERRY FOR COMMN OF LABOR	RALEIGH	2/11/2016	5,000.00
RONALD M CAMERON	LITTLE ROCK	CITIZENS FOR SUSAN MARTIN	WILSON	4/6/2016	2,500.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT MICHELE PRESNELL	BURNSVILLE	4/6/2016	2,500.00
Ronald Cameron	Little Rock	PAT MCCRORY COMM	CHARLOTTE	4/6/2016	5,000.00
Ronald Cameron	Little Rock	CITIZENS FOR BUCK NEWTON	WILSON	4/6/2016	5,000.00
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT CHAD BAREFOOT	WAKE FOREST	4/6/2016	5,000.00
RONALD CAMERON	LITTLE ROCK	MILLIS FOR NC HOUSE	HAMPSTEAD	4/8/2016	2,500.00
RONALD M. CAMERON	LITTLE ROCK	JUSTIN BURR FOR NC HOUSE	Albemarle	4/11/2016	5,000.00
RONALD M CAMERON	LITTLE ROCK	FOLWELL COMM	WINSTON SALEM	4/12/2016	2,500.00
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT DAN FOREST	CHARLOTTE	4/12/2016	2,500.00

DONOR	DONOR CITY	COMMITTEE/CANDIDATE	CANDIDATE CITY	DATE	AMOUNT \$
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT BILL COOK	CHOCOWINITY	4/13/2016	5,000.00
RONALD M CAMERON	LITTLE ROCK	BERRY FOR COMMN OF LABOR	RALEIGH	4/15/2016	5,000.00
RONALD CAMERON	LITTLE ROCK	MCINNIS FOR STATE SENATE	ROCKINGHAM	4/19/2016	2,402.20
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT DAN FOREST	CHARLOTTE	4/29/2016	2,500.00
RONALD M CAMERON	LITTLE ROCK	STEVE TROXLER AG COMMN	GREENSBORO	5/11/2016	5,000.00
Ronald Cameron	Little Rock	NC REPUBLICAN PARTY	RALEIGH	6/1/2016	15,000.00
Nina Cameron	Little Rock	PAT MCCRORY COMM	CHARLOTTE	6/1/2016	5,100.00
Ronald Cameron	Little Rock	NC REPUBLICAN PARTY	RALEIGH	9/19/2016	100,000.00
Ronald Cameron	Little Rock	NC REPUBLICAN HOUSE CAUCUS - NC GOP	RALEIGH	10/21/2016	25,000.00
RONALD M. CAMERON	LITTLE ROCK	FREEDOM PARTNERS ACTION FUND	ARLINGTON	10/31/2016	500,000.00
RONALD CAMERON	LITTLE ROCK	NC POULTRY FED INC PAC	RALEIGH	12/31/2017	5,000.00
Ronald Cameron	Little Rock	NC REPUBLICAN HOUSE CAUCUS - NC GOP	RALEIGH	3/16/2018	25,000.00
Ronald Cameron	Little Rock	NC REPUBLICAN PARTY	RALEIGH	3/20/2018	15,000.00
RONALD CAMERON	LITTLE ROCK	LARRY C STRICKLAND COMM	PINE LEVEL	3/20/2018	5,000.00
RONALD CAMERON	LITTLE ROCK	BRENT JACKSON FOR NC SENATE	AUTRYVILLE	3/20/2018	5,000.00
RONALD CAMERON	LITTLE ROCK	KYLE HALL COMMITTEE	KING	3/30/2018	2,500.00
RONALD CAMERON	LITTLE ROCK	HOLLO FOR NC SENATE	CONOVER	4/13/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	MALONE FOR NC HOUSE	WAKE FOREST	4/18/2018	5,000.00
RONALD CAMERON	LITTLE ROCK	BILL BRAWLEY COMM	MATTHEWS	4/18/2018	5,000.00
RONALD CAMERON		RICK HORNER FOR NC SENATE	WILSON	4/20/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	LOUIS PATE ELECTION COMM	MOUNT OLIVE	4/21/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT SCOTT STONE	CHARLOTTE	4/21/2018	5,000.00
RONALD M CAMERON	LITTLE ROCK	FRIENDS OF TRUDY WADE	GREENSBORO	4/21/2018	5,000.00
RONALD CAMERON	LITTLE ROCK	WILLIAM BRISSON COMM	DUBLIN	4/21/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT JEFF TARTE	CORNELIUS	4/24/2018	2,500.00
RONALD M. CAMERON	LITTLE ROCK	RE-ELECT JUSTICE JACKSON COMM	RALEIGH	4/25/2018	5,000.00
RONALD CAMERON	LITTLE ROCK	ALEXANDER FOR NC SENATE	RALEIGH	4/25/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	FRIENDS OF TRUDY WADE	GREENSBORO	6/19/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	MALONE FOR NC HOUSE	WAKE FOREST	6/19/2018	5,000.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT JEFF TARTE	CORNELIUS	6/26/2018	2,500.00
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT MICHAEL LEE	WILMINGTON	6/27/2018	5,000.00
RONALD M CAMERON	LITTLE ROCK	LOUIS PATE ELECTION COMM	MOUNT OLIVE	7/2/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	LOUIS PATE ELECTION COMM	MOUNT OLIVE	7/2/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	LOUIS PATE ELECTION COMM	MOUNT OLIVE	7/2/2018	2,500.00
RONALD CAMERON	LITTLE ROCK	(JOHN) ALEXANDER FOR NC SENATE	RALEIGH	7/2/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	JONATHAN JORDAN COMM	JEFFERSON	9/13/2018	2,500.00
RONALD M CAMERON	LITTLE ROCK	COMM TO ELECT SCOTT STONE	CHARLOTTE	9/13/2018	2,500.00
RONALD CAMERON	LITTLE ROCK	VOTE ANDY DULIN	CHARLOTTE	9/13/2018	1,000.00
RONALD CAMERON	LITTLE ROCK	THE JOHN R BRADFORD III COMM	CORNELIUS	9/13/2018	2,000.00
RONALD CAMERON	LITTLE ROCK	SAULS FOR NC HOUSE	SANFORD	9/13/2018	2,500.00

DONOR	DONOR CITY	COMMITTEE/CANDIDATE	CANDIDATE CITY	DATE	AMOUNT \$
RONALD CAMERON	LITTLE ROCK	COMM TO ELECT DONNY LAMBETH	WINSTON-SALEM	9/13/2018	2,500.00
RONALD CAMERON	LITTLE ROCK	LISA STONE BARNES FOR NC HOUSE	SPRING HOPE	9/13/2018	2,500.00
RONALD CAMERON	LITTLE ROCK	BILL BRAWLEY COMM	MATTHEWS	9/13/2018	2,500.00
RONALD CAMERON	LITTLE ROCK	NC SENATE MAJORITY FUND	RALEIGH	9/17/2018	10,000.00
RONALD CAMERON	LITTLE ROCK	DAVIS FOR NC HOUSE	WILMINGTON	9/27/2018	1,000.00
RONALD M CAMERON	LITTLE ROCK	LOUIS PATE ELECTION COMM	MOUNT OLIVE	10/17/2018	(2,400.00)
Ronald M Cameron	Little Rock	PHILIP E BERGER COMM	EDEN	10/19/2018	5,000.00
Ronald Cameron	Little Rock	NC REPUBLICAN SENATE CAUCUS - NC GOP	RALEIGH	10/19/2018	5,000.00
RONALD CAMERON	LITTLE ROCK	BRENT JACKSON FOR NC SENATE	AUTRYVILLE	10/19/2018	5,000.00
RONALD CAMERON	LITTLE ROCK	KATHY HARRINGTON COMM	GASTONIA	10/19/2018	5,000.00
RONALD M CAMERON	LITTLE ROCK	HARRY BROWN FOR NC SENATE	JACKSONVILLE	10/24/2018	5,000.00
RONALD M CAMERON	LITTLE ROCK	RABON FOR SENATE	SOUTHPORT	10/25/2018	5,000.00
TOTAL					985,202.20